

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X

IN RE TERRORIST ATTACKS ON

CIVIL ACTION NO.

SEPTEMBER 11, 2001

03 MDL 1570 (GBD)

-----X

FIONA HAVLISH, in her own right :  
and as Executrix of the ESTATE OF :  
DONALD G. HAVLISH, JR., Deceased, :  
*et al.*, :

CIVIL ACTION NO.  
03-CV-9848 – GBD

v. :

THE ISLAMIC REPUBLIC OF IRAN :  
*et al.* :

PLAINTIFFS' DAMAGES INQUEST MEMORANDUM

**Exhibit M**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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IN RE TERRORIST ATTACKS ON

CIVIL ACTION NO.

SEPTEMBER 11, 2001

03 MDL 1570 (GBD)

-----X  
FIONA HAVLISH, in her own right  
and as Executrix of the ESTATE OF  
DONALD G. HAVLISH, JR., Deceased,

:  
:  
:

CIVIL ACTION NO.

RUSSA STEINER, in her own right  
and as Executrix of the ESTATE OF  
WILLIAM R. STEINER, Deceased,

:  
:  
:

03-CV-9848 – GBD

CLARA CHIRCHIRILLO, in her own right  
and as Executrix of the ESTATE OF  
PETER CHIRCHIRILLO, Deceased,

:  
:  
:

Case Transferred from the  
United States District Court  
for the District of Columbia  
Case Number 1:02CV00305

TARA BANE, in her own right,  
  
and as Executrix of the ESTATE OF  
MICHAEL A. BANE, Deceased,

:  
:  
:  
:

**AFFIDAVIT OF  
THOMAS E. MELLON, JR.  
REGARDING ATTORNEY  
EXPENSES**

GRACE M. PARKINSON-GODSHALK, in her  
own right and as Executrix of the ESTATE OF  
WILLIAM R. GODSHALK, Deceased,

:  
:  
:

ELLEN L. SARACINI, in her own right  
and as Executrix of the ESTATE OF  
VICTOR J. SARACINI, Deceased,

:  
:  
:

THERESANN LOSTRANGIO, in her own right  
and as Executrix of the ESTATE OF  
JOSEPH LOSTRANGIO, Deceased, *et al.*,

:  
:  
:

Plaintiffs,

v.

:  
:

SHEIKH USAMAH BIN-MUHAMMAD  
BIN-LADEN, a.k.a. OSAMA BIN-LADEN,

:  
:

AL-QAEDA/ISLAMIC ARMY,

:  
:

an unincorporated association, *et al.*, :

*FOREIGN STATE DEFENDANTS:* :

THE ISLAMIC REPUBLIC OF IRAN, :

AYATOLLAH ALI-HOSEINI KHAMENEI, :

ALI AKBAR HASHEMI RAFSANJANI, :

IRANIAN MINISTRY OF  
INFORMATION AND SECURITY, :

THE ISLAMIC REVOLUTIONARY  
GUARD CORPS, :

HEZBOLLAH,  
an unincorporated association, :

THE IRANIAN MINISTRY  
OF PETROLEUM, :

THE NATIONAL IRANIAN  
TANKER CORPORATION, :

THE NATIONAL IRANIAN  
OIL CORPORATION, :

THE NATIONAL IRANIAN  
GAS COMPANY, :

IRAN AIRLINES, :

THE NATIONAL IRANIAN  
PETROCHEMICAL COMPANY, :

IRANIAN MINISTRY OF  
ECONOMIC AFFAIRS AND FINANCE, :

IRANIAN MINISTRY OF  
COMMERCE, :

IRANIAN MINISTRY OF DEFENSE  
AND ARMED FORCES LOGISTICS, :

THE CENTRAL BANK OF THE :  
ISLAMIC REPUBLIC OF IRAN, *et al.*, :  
: :  
Defendants. :

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**AFFIDAVIT**  
**REGARDING ATTORNEY EXPENSES**

I, **Thomas E. Mellon, Jr.**, of Mellon Webster & Shelly of Doylestown, Pennsylvania, am the Co-Lead Counsel in the above-captioned case along with **Dennis G. Pantazis** of Wiggins, Childs, Quinn & Pantazis of Birmingham, Alabama.

Since February 2002, the *Havlish* consortium of plaintiff attorneys have carefully documented all expenditures by the below named thirteen law firms which have contributed to the overall expenses pertaining to every aspect of the *Havlish* case, including but not limited to, investigators; court fees; over 100 client interviews; approximately 35 expert interviews; domestic travel throughout the United States; international travel involving approximately 20 trips to Canada, Greece, Germany, France, and Great Britain for witness interviews and meetings with foreign governmental officials; hotel expenses; expert witness fees; thousands of telephone and conference calls; contract attorneys; meetings and general office costs.

*Havlish* Plaintiff attorneys **Richard Hailey** and **Mary Beth Ramey** of Ramey & Hailey of Indianapolis, Indiana and **Don Winder** of Winder & Counsel of Salt Lake City, Utah, have supervised the accounting of the *Havlish* case.

Accordingly, I hereby certify, affirm and swear that the following the expenses were incurred in the investigation and prosecution of the *Havlish* case to date:

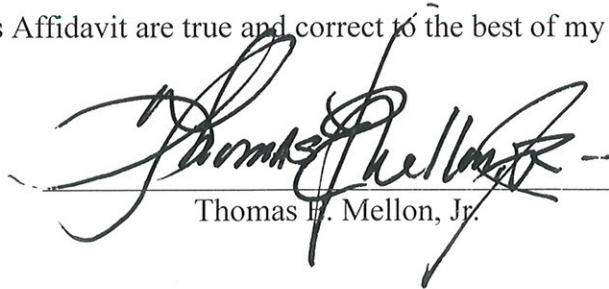
Burbidge & Mitchell The Parkside Tower 215 S. State Street, #920 Salt Lake City, UT 84111	\$50,000.00
Foote, Meyers, Mielke & Flowers, LLC 3 North Second Street Suite 300 St. Charles, IL 60174	\$139,663.80
Howarth & Smith 523 West Sixth Street Suite 728 Los Angeles, CA 90017	\$41,519.00
Lamm Rubenstone, LLC 3600 Horizon Blvd., Suite 200 Trevose, PA 19053	\$108,787.00
David C. Lee, Esquire 37 N. Orange Ave., Suite 500 Orlando, FL 32801	\$105,000.00
Law Office of J.D. Lee 422 South Gay Street, 3 <sup>rd</sup> Floor Knoxville, TN 37902	\$213,620.81
Mellon Webster & Shelly 87 N. Broad Street Doylestown, PA 18901	\$646,521.22
Ness, Motley, P.A. 28 Bridgeside Blvd Mt. Pleasant, SC 29464	\$25,000.00
Ramey & Hailey 9333 North Meridian Street, Suite 105 Indianapolis, IN 46260	\$77,200.00
Stein, Mitchell & Mezines 1100 Connecticut Avenue NW Washington, DC 20036	\$27,500.00
Terrell Hogan Ellis Yegelwel, P.A. 233 East Bay Street Blackstone Building, 8 <sup>th</sup> Floor Jacksonville, FL 32202	\$182,485.34

Wiggins, Childs, Quinn & Pantazis, LLC                      \$292,511.68  
The Kress Building  
301 19<sup>th</sup> Street North  
Birmingham, AL 35203

Winder & Counsel    \$68,037.64  
175 West 200 South, Suite 4000  
P.O. Box 2668  
Salt Lake City, UT 84110-2668

**TOTAL EXPENSES:**    **\$1,977,846.49**

I, **THOMAS E. MELLON, JR.**, being duly sworn, do hereby swear and affirm under penalty of perjury that the contents of this Affidavit are true and correct to the best of my knowledge, information, and belief.

  
Thomas E. Mellon, Jr.

Sworn to before me this the 14<sup>th</sup> day of February, 2012, in Pennsylvania.

  
\_\_\_\_\_  
*Notary Public*

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Susan T. Case, Notary Public  
Doylestown Boro, Bucks County  
My Commission Expires April 7, 2013  
Member, Pennsylvania Association of Notaries